# IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

AMDOCS (ISRAEL) LIMITED, an Israeli Corporation,

Case No. 1:10cv910 (LMB/TRJ)

Plaintiff,

V.

OPENET TELECOM, INC., a Delaware Corporation, and OPENET TELECOM LTD., an Irish Corporation,

Defendants.

# OPENET TELECOM, INC. AND OPENET TELECOM LTD.'S RULE 26(a)(3) PRE-TRIAL DISCLOSURES

Defendants Openet Telecom, Inc. and Openet Telecom Ltd. ("Openet") makes the following disclosures pursuant to Fed. R. Civ. P. 26(a)(3) and the Court's April 29, 2011 Consent Scheduling and Final Pretrial Order (Dkt. No. 79):

#### **List of Witnesses**

The witnesses Openet expects to present at trial and the witnesses Openet may call if the need arises are as follows:

Witness	Will Call	May Call
Joseph Hogan	X	
Philip Hogan		X
Niall Norton	X	
Eimer McGovern		X
Niall Byrne		X
Alan McNamee		X
Michael Manzo	X	
Noel O'Rafferty		X
Juliana Su	X	
Gaogao Wang		X
Tal Givoly		X
Limor Schweitzer		X
Eran Wagner		X
Kevin J. Zilka	-	X

Udi Hershkovich		X
Zur Yahalom		X
Patrick McDaniel	X	
Michael I. Shamos	X	
Mary Woodford	X	
Ellen W. Zegura		X
Mark J. Hosfield		X
Any witness identified by Plaintiff		X

## **Deposition Designations**

Openet may use testimony from one or more of the following witnesses by means of deposition, depending upon the proofs and positions taken by Plaintiff at trial. Openet's deposition designations by name, page, and line reference are as follows:

Witness	<b>Deposition Date</b>	Reference	Plaintiff's Objections	Plaintiff's Counter- designations
Tal Givoly	February 10, 2011	8:7-24		
		9:17-10:4		
		23:3-25:10		
		51:24-52:25		
		56:9-57:18		
		87:18-87:22		
		96:12-96:14		
		100:22-101:20		
		101:22-102:4		
		124:4-124:9		
		137:5-137:25		
		194:2-198:11		
		220:12-25		
		221:3-19		
		225:6-226:20		
	February 11, 2011	446:12-447:22		
		448:23-450:5		
		456:11-457:15		
		477:8-479:3		
		481:7-18		
	March 3, 2011	530:3-10		
	,	636:12-642:6		
	April 26, 2011	5:7-14		
	•	6:18-7:10		
		20:13-21:3		

		57:12-60:25	
		66:8-10	
<u> </u>		70:12-71:18	
Limor Schweitzer	February 24, 2011	9:13	
		29:10-30:25	
		96:20-97:20	
		101:19-102:13	
		103:6-18	
		104:23-106:25	
		107:4-20	
		109:15-110:7	
		128:13-130:1	
		131:17-132:11	
		135:13-19	
		135:21-135:25	
		142:25-143:24	
		156:19-159:25	
Udi Hershkovich	February 9, 2011	7:4-23	
		46:20-47:14	
		48:15-21	
		50:24-52:24	
		59:16-61:5	
		94:16-22	
		96:23-97:4	
		97:7	
		106:9-108:24	
		138:25-139:12	
Zur Yahalom	February 24, 2011	7:11-8:14	
		41:17-21	
		42:1-6	
		42:8-16	
		112:19-113:4	
		113:6-7	
		226:15-227:3	
		227:5-7	
Niall Byrne	February 3, 2011	7:2-7	
		11:11-17	
		13:2-3	
		84:21-86:6	
Noel O'Rafferty	March 9, 2011	8:9-20	
		28:7-14	
		31:1-7	

May 13, 2011

Respectfully submitted,

/s/

James H. Wallace Jr. (admitted *pro hac vice*)
Eric H. Weisblatt (VSB No. 21561)
Anthony Son (admitted *pro hac vice*)
Brian H. Pandya (VSB No. 72233)
Joseph Shin (VSB No. 79051)
Adrienne Johnson (VSB No. 78631)
WILEY REIN LLP
1776 K Street NW
Washington, D.C. 20006
Telephone: (202) 719-7000

Telephone: (202) 719-7000 Facsimile: (202) 719-7049

Counsel for Openet Telecom, Inc. and Openet Telecom Ltd.

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 13th day of May, 2011, I filed the foregoing Openet Telecom, Inc. and Openet Telecom Ltd.'s Rule 26(a)(3) Pre-Trial Disclosures with the Clerk of Court via CM/ECF which will then send a notification of such filling to following counsel for Amdocs (Israel) Ltd.

Gregory H. Lantier, Esq. WilmerHale LLP 1875 Pennsylvania Avenue, N.W. Washington, DC 20006 Gregory.Lantier@wilmerhale.com

<u>/s/</u>	
Joseph Shin	